

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CARDILLO & SONS, INC.,)
)
Plaintiff)
)
vs.)
)
OFFICIAL SECURITY, INC., MRH)
INTERNATIONAL, INC., DARRYL)
CRONFELD and MARGARET R.)
CRONFELD,)
)
Defendants)

DOCKET NO.: 04-12496-JLT

**MOTION OF ROBERT M. BONIN, BONIN AND MARASHIAN
FOR LEAVE TO WITHDRAW APPEARANCE FOR DEFENDANTS**

In accordance with Local Rule 83.5.2(b) the undersigned moves for leave of court to withdraw as attorney for all Defendants in this matter and states as reasons therefore the failure of Defendants to pay legal bill as required by the written Legal Services Agreement entered into and because of the clients' wishes, behavior and gross racial insult of Robert M. Bonin.

There is an appearance for Defendants by Attorney John R. Lusk, Esq., 517 S. Third Street, Las Vegas, Nevada 89101 who has been admitted pro hac vice. There is a conference scheduled for February 7, 2006 at 10:00 a.m. before Judge Joseph L. Tauro.

Filed herewith, at clients' request, is an email dated December 19, 2005 which states in the last two lines "Let me say; you may withdraw. Please make sure that you show the Judge this email. . ."

Respectfully submitted,

/s/ Robert M. Bonin

Robert M. Bonin (BBO#049100)

Bonin & Marashian

77 Franklin Street

Boston, MA 02110

(617) 723-2525

DATED: January 4, 2006

Robert Bonin

From: Robert Bonin [rbonin@boninmarashian.com]
Sent: Tuesday, December 20, 2005 10:12 AM
To: 'OSIGUARDS@aol.com'
Cc: 'jrl@lvcoxmail.com'
Subject: RE: Jumping the Gun

Mr. Cronfeld: Your email is seriously in error and insulting; you omitted reference to your racial slur. I will not reply further as such but will send you a letter dealing with withdrawal and related matters. R.Bonin

-----Original Message-----

From: OSIGUARDS@aol.com [mailto:OSIGUARDS@aol.com]
Sent: Monday, December 19, 2005 5:36 PM
To: rbonin@boninmarashian.com
Subject: Jumping the Gun

Dear Mr. Bonin,

I believe the manner in which you spoke to me today has placed you in the same level as a Used Car Salesman.

I told John Lusk back in August of 2005 that you absolutely had no grasp of this case. I additionally told Mr. Lusk that Mr. Tocci had an tremendous grasp of this matter. I also told Mr. Lusk that I felt that Tocci; wiped your clock clean twice in front of the Judge.

This case could have come to a closure much sooner if you would have taken the time to listen to me.

You might have all of the legal knowledge but, you do not have the business acumen that this case needed.

When you stated to me today that "In my fifty years of practice, Nobody beats me for money." I knew exactly what you were all about.

At no time did I ever state that I wasn't paying you. I emphatically told John Lusk that no money was coming forward until this case was settled properly.

During today's call you jumped the gun about the money. Anything and everything you could do to alienate a client you did.

Threats to withdraw from the case; and saying you are suing me for payment all in the same breath was very classy.

You also stated that the \$11,000.00 really did not mean that much to you. Well, if it doesn't. Please let me know the charity that you wish me to donate it to.

Let me say; you may withdraw.

Please make sure that you show the Judge this email...

Darryl Cronfeld

Office: 702.369.4366
Cell: 702.768.4366
Fax: 702.369.4369

12/20/2005

CERTIFICATE OF SERVICE

I, Robert M. Bonin, Attorney for the Defendants Official Security, Inc., MRH, International, Inc., Darryl Cronfeld and Margaret R. Cronfeld, hereby certify that I have this day filed electronically with the United States District Court for the District of Massachusetts and served by first class mail, postage prepaid, a copy of the within Motion of Robert M. Bonin, Bonin and Marashian for Leave to Withdraw Appearance for Defendants, such service was made on the Plaintiff's counsel of record, John F. Tocci, Esq., Tocci, Goss & Lee, P.C., 35 India Street, 5th Floor, Boston, MA 02110 with a copy to all Defendants by certified mail/return receipt requested and regular mail, c/o Darryl Cronfeld, 3534 Leor Court, Las Vegas, NV 89121 and on Attorney John R. Lusk, 517 S. Third Street, Las Vegas, NV 89101.

Signed this 4th day of January 2006.

/s/ Robert M. Bonin

Robert M. Bonin, Esq.
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